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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RACHELLE COLVIN, individually and as
next friend of minor Plaintiff, G.D., and
DANIELLE SASS, individually and as next
friend of minor plaintiff, L.C., and on behalf
of all others similarly situated,

Plaintiffs,

v.

ROBLOX CORPORATION, SATOZUKI
LIMITED B.V., STUDS
ENTERTAINMENT LTD., and RBLXWILD
ENTERTAINMENT LLC,

Defendants.

Civil Action No.: 3:23-cv-04146-VC

REQUEST TO ENTER DEFAULT

TO: THE CLERK OF THE ABOVE-ENTITLED COURT

In accordance with Federal Rule of Civil Procedure 55(a), Plaintiffs Rachelle Colvin, individually and as next friend of minor Plaintiff, G.D., and Danielle Sass, individually and as next friend of minor plaintiff, L.C., hereby request that the Clerk of this Court enter a default in this matter against Defendant Studs Entertainment LTD (“Studs”) on the ground that said Defendant has failed to appear or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure.

Pursuant to Federal Rule of Civil Procedure 12(a)(1), the deadline for Defendant Studs to respond passed over twenty-three days ago. *See* Declaration of Aaron Freedman in Support of Request to Enter Default (“Freedman Decl.”) ¶ 6, filed herewith. Plaintiffs effectuated service of the summons and complaint on Defendant Studs on January 26, 2024, as evidenced by the Proof of

1 Service on file with the Court. *See* ECF No. 62; *see also* Freedman Decl. ¶ 4. As a result, Defendant
2 Studs' responsive pleading was due on or before February 16, 2024. Freedman Decl. ¶ 6. Defendant
3 Studs, however, has failed to file or serve an answer or other responsive pleading and has not
4 otherwise appeared to contest this action. *Id.* ¶ 7.

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6 Dated: March 11, 2024

Respectfully submitted,

7
8 /s/ Aaron Freedman

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24 *Counsel for Plaintiff and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2024, the foregoing document(s) was filed through the ECF system, which sent electronic notice of the filing to all counsel of record.

/s/ Aaron Freedman